

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

SALLY WHITE,

Plaintiff,

v.

SMITHS DETECTION, INC., et al.,

Defendants.

CIVIL ACTION NO.:
2:10-cv-04078-SRC-MAS

**NOTICE OF MOTION FOR RECONSIDERATION OF THE COURT'S ORDER
DATED APRIL 18, 2011 UNDER LOCAL R. 7.1
RETURNABLE JUNE 6, 2011**

Of Counsel and On the Brief
Ellen O'Connell EO0456

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TO:

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New York NY 10022

PLEASE TAKE NOTICE that on Monday, June 6, 2011 at 9:00 A.M. or as soon thereafter as counsel may be heard, the undersigned attorneys for the Plaintiff, Sally White, will make application to the Hon. Stanley R. Chesler, for an Order as follows:

A. For reconsideration of the court's Order of April 18, 2011 under Local R. 7.1; and,

B. For leave amend the Plaintiff's First Amended Complaint to add allegations set forth in pages 2-3 of the accompanying Brief.

PLEASE TAKE FURTHER NOTICE that the Plaintiff will rely on the accompanying Brief in Support of the Motion under Local R. 7.1.

Respectfully submitted

LAW OFFICE OF ELLEN O'CONNELL, L.L.
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s/Ellen O'Connell

By: _____
Ellen O'Connell, Esq. (EO0456)

Dated: May 2, 2011

CERTIFICATION OF SERVICE

Ellen O'Connell, hereby certifies as follows:

I am an attorney at law of the State of New Jersey and the Principal Member of the Law Office of Ellen O'Connell, L.L.C., counsel to the Plaintiff, Sally White.

I certify that I filed electronically true versions of (1) the Plaintiff's Notice of Motion for Reconsideration under Local R. 7.1, and (2) the Plaintiff's Brief in Support of the Motion this day, May 2, 2011, and that copies are available for viewing and downloading from the U.S. District Court's ECF System, and was served this day on May 2, 2011, on the following counsel of record for the

Defendants:

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I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

s/Ellen O'Connell
Ellen O'Connell (EO0456)